

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

THE NAVAJO NATION,

Plaintiff,

v.

No. 1:25-cv-00055-JMC-GBW

THE UNITED STATES OF AMERICA,
Debra Ann HAALAND, in her official
capacity as Secretary of the Interior,
U.S. DEPARTMENT OF THE INTERIOR;
U.S. BUREAU OF LAND MANAGEMENT,

Federal Defendants,

and

PUEBLO OF ACOMA and PUEBLO OF
LAGUNA,

Defendant-Intervenors.

**JOINT MOTION OF PLAINTIFF AND FEDERAL DEFENDANTS
TO STAY PROCEEDINGS FOR NINETY (90) DAYS**

COME NOW Plaintiff and the Federal Defendants (“Parties”), by and through their respective counsel of record, and, pursuant to D.N.M.LR-Civ. 7.1(a), hereby jointly move to stay of proceedings in this matter for ninety (90) days after the entry of an order granting the stay in this matter. In support of this Motion, the Parties state:

1. This case involves a challenge to Public Land Order No. (“PLO”) 7329 withdrawing 336,404 acres of land from new oil and gas leasing within a 10-mile buffer zone around Chaco Canyon.

2. On January 20, 2025, President Trump issued Executive Order (“EO”) 14154, “Unleashing American Energy,” directing the Secretary of the Interior to review all public land

withdrawals. On February 3, 2025, consistent with the President's Executive Order, Secretary of the Interior Doug Burgum issued Secretarial Order ("SO") 3418, "Unleashing American Energy," directing review and potential revision of public lands previously withdrawn from public entry.

3. On May 28, 2025, consistent with EO 14154 and SO 3148, the Bureau of Land Management initiated meetings with Tribes regarding the potential partial revocation of PLO 7923.

4. It is the Parties' understanding that the Department of the Interior intends to review the PLO, changes to which might satisfy or potentially moot the Navajo Nation's claims.

5. Given these developments, the Parties have agreed that the Court should stay these proceedings for ninety (90) days pending the agency's changes or revocation of PLO 7923. The stay will serve the interest of judicial efficiency and may obviate the need for further litigation.

6. Intervenors have been contacted through counsel regarding their position on the Motion, and have been advised that "Intervenors Pueblo of Acoma and Pueblo of Laguna are unable to take a position on this motion as neither has received a properly noticed request for Tribal Consultation on PLO 7923."

7. In accordance with the requirements of D.N.M.LR-Civ. 7.2, a proposed order granting the relief requested herein and approved by Plaintiff and the Federal Defendants will be submitted to the Court for consideration.

WHEREFORE, the Parties respectfully request that this Court grant the stay in this matter for ninety (90) days from the date of entry of the order granting this request.

Dated: July 1, 2025.

Jointly and respectfully submitted,

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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By /s/ Electronically approved June 30, 2025
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Counsel for Federal Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2025, a true and correct copy of foregoing JOINT MOTION OF PLAINTIFF AND FEDERAL DEFENDANTS TO STAY PROCEEDINGS FOR NINETY (90) DAYS was filed electronically pursuant to CM/ECF procedure for the United States District Court for the District of New Mexico, which caused the parties to be served via electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Eric R. Burris

Eric R. Burris

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